

KING & SPALDING

BY ECF

September 16, 2022

The Honorable Denise L. Cote
United States District Court for the Southern District of New York
500 Pearl Street, Room 1910
New York, New York 10007

Re: Google LLC v. Starovikov, et al., 1:21-cv-10260-DLC

Dear Judge Cote:

I write on behalf of Google LLC pursuant to Section 8 of the Court's Individual Rules of Practice in Civil Cases to respectfully request that the Court permit Google to file under seal certain exhibits attached to the Declaration of Laura Harris in Further Support of Google LLC's Motion for Sanctions and in Opposition to Defendants' Motion for Sanctions (the "9/16/22 Harris Declaration"). Specifically, the 9/16/22 Harris Declaration attaches Defendants' initial and amended responses to Google's discovery requests:

- Defendants' Objections and Responses to Google's First Set of Interrogatories, dated September 6, 2022 (Exhibit 2);
- Defendants' Objections and Responses to Google's First Set of Requests for Production and Inspection, dated September 6, 2022 (Exhibit 3);
- Defendants' Amended Objections and Responses to Google's First Set of Interrogatories, dated September 15, 2022 (Exhibit 4); and
- Defendants' Amended Objections and Responses to Google's First Set of Requests for Production and Inspection, dated September 15, 2022 (Exhibit 5).

While there is no Protective Order in effect in this case with respect to confidential or sensitive information, Defendants have designated their initial and amended response to Google's Interrogatories as "Confidential." Defendants did not similarly designate their initial and amended response Google's Requests for Production and Inspection. Nonetheless, in an abundance of caution, Google requests that it be permitted to file all of Defendants' discovery responses under seal in order to allow Defendants to submit any further submissions and argument for why these documents should remain under seal, should they so choose. Google does not object to these documents being filed publicly.

Pursuant to Section 8 of the Court's Individual Rules of Practice in Civil Cases, Google is filing under seal copies of Exhibits 2-5 to the 9/16/22 Harris Declaration contemporaneously with this letter.

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Respectfully submitted,

/s/ Laura Harris

Laura Harris

The documents may be filed under seal. The defendants shall identify by September 27 any passages that should not be filed in the public record and explain why that is so. In the absence of such a showing, the documents will be publicly filed.

Laura Harris
9/22/22